

Bruce K. Medeiros, WSBA No. 16380
DAVIDSON BACKMAN MEDEIROS PLLC
601 W. Riverside Avenue, Suite 1550
Spokane, Washington 99201
Telephone: (509) 624-4600
Facsimile: (509) 623-1660
Email: bmedeiros@dbm-law.net

Honorable Christopher M. Alston
Chapter 11

Attorney for CardConnect, LLC

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re. . .

**NORTHWEST TERRITORIAL MINT
LLC,**

Debtor.

Case No. **16-11767-CMA**

**EX PARTE MOTION FOR
EXAMINATION OF MARK CALVERT,
TRUSTEE PURSUANT TO RULE 2004
AND SUBPOENAS PURSUANT TO
RULE 9016**

CardConnect, LLC ("CardConnect"), a creditor in the above-captioned proceeding, by and through its counsel Bruce K. Medeiros of Davidson Backman Medeiros PLLC, moves the Court for entry of an ex parte order for examination of Mark Calvert, Trustee (the "Trustee") for Northwest Territorial Mint, LLC ("NWTM") pursuant to Rule 2004 (a), (b) and (c) of the Federal Rules of Bankruptcy Procedure and for issuance of a subpoena under Rule 9016 of the Federal Rules of Bankruptcy Procedure, if necessary.

1. On April 1, 2016, NWTM filed a voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code.

2. On April 11, 2016, the Trustee was appointed as the Chapter 11 Trustee of NWTM.

DAVIDSON BACKMAN MEDEIROS
ATTORNEYS AT LAW
A PROFESSIONAL LIMITED LIABILITY COMPANY

1550 BANK OF AMERICA FINANCIAL CENTER
601 WEST RIVERSIDE AVENUE
SPOKANE, WASHINGTON 99201
FACSIMILE: (509) 623-1660
(509) 624-4600

3. Since his appointment, the Trustee has maintained exclusive control and authority over NWTM's business operations and records.

4. CardConnect deems it essential to examine the Trustee or to examine records and documents in his possession, custody or control as described in Exhibit A pursuant to Bankruptcy Rule 2004, to determine its claim against NWTM in this case, and to issue a subpoena directed to the Trustee for production of such records and documents under Rule 9016 of the Federal Rules of Bankruptcy Procedure, if necessary.

5. It is the understanding of counsel for CardConnect that K & L Gates, LLC, counsel for the Trustee has most, if not all of the information sought by CardConnect hereunder in its possession and is ready to turnover such information upon entry of an order by the Court granting this Motion, and that the Trustee will not be objecting to this Motion.

WHEREFORE, CardConnect respectfully requests that the court enter an order in substantially the form filed concurrently herewith.

DATED this 3rd day of June 2016.

DAVIDSON BACKMAN MEDEIROS PLLC

/s/ Bruce K. Medeiros
Bruce K. Medeiros, WSBA No. 16380
Attorney for CardConnect, LLC

DAVIDSON BACKMAN MEDEIROS
ATTORNEYS AT LAW
A PROFESSIONAL LIMITED LIABILITY COMPANY

1550 BANK OF AMERICA FINANCIAL CENTER
601 WEST RIVERSIDE AVENUE
SPOKANE, WASHINGTON 99201
FACSIMILE: (509) 623-1660

Page 2
Ex Parte Motion for Examination of Trustee
Card Connect.sa

Case 16-11767-CMA Doc 380 Filed 06/03/16 Ent. 06/03/16 15:08:21 Pg. 2 of 3

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 20
- 21
- 22
- 23
- 24
- 25

2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
20
21
22
23
24
25

3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
20
21
22
23
24
25

- 0
1
2
3
4
5
6
7
8
9
20
21
22
23
24
25